

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE ORGANOGENESIS SECURITIES
LITIGATION

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: Case No.: 1:04cv10027-JLT
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**PLAINTIFFS' MOTION FOR PROTECTIVE ORDER DISALLOWING THE
DEPOSITIONS OF DR. RICHARD S. CONEN AND JOHN H. BOWIE, JR.**

Plaintiffs, through their attorneys, hereby move this Court pursuant to Rule 26 of the Federal Rules of Civil Procedure to issue a protective order disallowing Defendants from taking the depositions of Dr. Richard S. Conen and John H. Bowie, Jr. The grounds for this motion are set forth in the accompanying Memorandum of Law.

WHEREFORE, Plaintiffs request that this Motion for Protective Order be granted in full.

Dated: August 18, 2006

MOULTON & GANS, P.C.

By: /s/ Nancy Freeman Gans
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CERTIFICATION PURSUANT TO LOCAL RULES 7.1 AND 37.1

I, Nancy Freeman Gans, hereby certify that Peter Sloane, Esquire, Milberg Weiss, Bershad & Schulman LLP, Lead Counsel for Plaintiffs conferred by correspondence with Jonathan A. Shapiro, Esquire, Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Defendants Donna Abelli Lopolito, Michael Sabolinski, Philip Laughlin, Albert Erani and Alan Ades, Peter Saparoff,, Esquire, Mintz, Levin, Cohn, Feris Glovsky and Popeo, P.C., counsel for Defendant Herbert M. Stein; and Sara Jane Shanahan, Esquire, Griesingr, Tighe & Maffei, LLP, counsel for Defendant John J. Arcari with respect to this motion. Defendants oppose this Motion.

/s/ Nancy Freeman Gans
Nancy Freeman Gans

CERTIFICATE OF SERVICE

I, Nancy Freeman Gans, hereby certify that a true copy of the above document was served upon the attorney of record for each party via ECF.

/s/ Nancy Freeman Gans
Nancy Freeman Gans